

Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROTHSCHILD BROADCAST
DISTRIBUTION SYSTEMS, LLC,

Plaintiff,

v.

CREATIVELIVE, INC.,

Defendant.

Civil Action No. 22-cv-771JLR

STIPULATED MOTION TO SET ASIDE
DEFAULT AND EXTEND TIME TO
RESPOND TO COMPLAINT

NOTE ON MOTION CALENDAR:
July 11, 2022

Plaintiff ROTHSCCHILD BROADCAST DISTRIBUTION SYSTEMS, LLC
("Rothschild") and Defendant CREATIVELIVE, INC. ("CreativeLive"), hereby stipulate as
follows:

Rothschild filed a Complaint against CreativeLive alleging patent infringement on June 2,
2022 (Dkt. 1), and served it upon CT Corporation System ("CT Corporation"), registered agent
for CreativeLive, on June 7, 2022.


CreativeLive has represented that after being served with the summons and complaint on
June 7, 2022, CT Corporation sent a copy of the summons and complaint via email to the outdated
contact information of a former employee of CreativeLive, which was never received, and mailed
a copy of the complaint to CreativeLive via UPS, but the package, to date, was never delivered to

STIPULATED MOTION TO SET ASIDE DEFAULT
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COMPLAINT - 1

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CCRL-6-0002P04 JSR

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1 CreativeLive's corporate offices. Accordingly, CreativeLive states that it never received the served
2 summons and complaint from CT Corporation.

3 Rothschild filed proof of service on July 1, 2022 indicating that service of the complaint
4 and summons in this matter on CT Corporation occurred on June 7, 2022 (Dkt. 8), and sought
5 entry of default against CreativeLive the same day, which was entered on July 5, 2022 (Dkt. 11).

6 CreativeLive states that it first learned it had been served and of the entry of default on
7 July 6, 2022, and immediately contacted Rothschild. CreativeLive states that it received for the
8 first time an electronic copy of the summons from CT Corporation on July 7, 2022.

9 Rothschild lacks sufficient information to take a position on CreativeLive's foregoing
10 statements. The Parties wish to cooperate in setting aside the default and providing a period of
11 time for CreativeLive to evaluate the Rothschild complaint and respond to it. Accordingly,
12 pursuant to Fed. R. Civ. P. 55(c), the Parties respectfully request that the Court:

- 13 1. Set aside the default against CreativeLive; and
 - 14 2. Grant CreativeLive an extension until July 28, 2022 to respond to Rothschild's
15 complaint.
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1 RESPECTFULLY SUBMITTED July 11, 2022.

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STIPULATED MOTION TO SET ASIDE DEFAULT
AND EXTEND TIME TO RESPOND TO
COMPLAINT - 3

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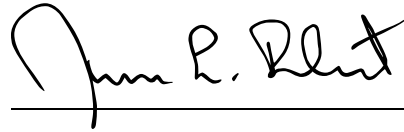


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ORDER

Stipulation approved and so ordered.

DATED this 11th day of July, 2022.



JAMES L. ROBART
United States District Judge

STIPULATED MOTION TO SET ASIDE DEFAULT
AND EXTEND TIME TO RESPOND TO
COMPLAINT - 4

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